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PARAMOUNT EQUITY MORTGAGE, LLC
dba LOANPAL

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DONALD SULLIVAN,
Plaintiff,
v.
PARAMOUNT EQUITY
MORTGAGE, LLC dba LOANPAL,
Defendant.

Case No. 2:19-cv-00567-APG-BNW
**STIPULATION FOR EXTENSION
OF TIME TO RESPOND TO
PLAINTIFF'S COMPLAINT
(FIRST REQUEST)**

Defendant Paramount Equity Mortgage, LLC dba Loanpal (hereinafter "Loanpal"), by and through its counsel, Timothy J. Lepore of Ropers Majeski Kohn & Bentley, and Plaintiff Donald Sullivan ("Plaintiff"), by and through his counsel, Michael Kind of Kazerouni Law Group, APC, hereby stipulate and agree as follows:

1. On April 4, 2019, Plaintiff filed his Complaint in the United District Court, Central District of Nevada, naming Loanpal as a defendant.

2. On April 5, 2019, this Court issued Summons for Loanpal, directing Loanpal to respond to the Complaint within 21 days after service of the Complaint and Summons.

3. On April 17, 2019, Plaintiff caused for a process server to serve the Complaint and Summons on Loanpal's registered agent. As a result, according to

1 Rule 12 of the Federal Rules of Civil Procedure, Loanpal's last day to respond to
2 Plaintiff's Complaint is May 8, 2019.

3 4. The parties subsequently entered into settlement negotiations in an
4 attempt to bring this matter to resolution before engaging in protracted litigation.

5 5. Accordingly, Plaintiff and Loanpal have stipulated that Loanpal's last
6 day to file a responsive pleading or motion to Plaintiff's Complaint is June 19,
7 2019.

8 **IT IS SO STIPULATED.**

9 Dated: May 21, 2019

ROPERS, MAJESKI, KOHN &
BENTLEY

11 By: /s/ Timothy J. Lepore

12 TIMOTHY J. LEPORE
13 Attorneys for Defendant
14 PARAMOUNT EQUITY
MORTGAGE, LLC
dba LOANPAL

15 Dated: May 21, 2019

KAZEROUNI LAW GROUP, APC

17 By: /s/ Michael Kind

18 MICHAEL KIND
19 Attorneys for Plaintiff
DONALD SULLIVAN

20 **IT IS SO ORDERED:** Defendant Loanpal's last day to file a responsive
21 pleading or motion to Plaintiff's Complaint is June 19, 2019.
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24 UNITED STATES MAGISTRATE JUDGE

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27 Dated: May 22, 2019
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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of May, 2019, I served a true and correct copy of the foregoing **STIPULATION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT (FIRST REQUEST)** via the Court's CM/ECF electronic filing and service system to all parties on the current service list.

/s/ Peggy Kurilla

Peggy Kurilla, an employee of
ROPERS, MAJESKI, KOHN &
BENTLEY